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NORTHERN DISTRICT OF TX
FORT WORTH DIVISION
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IN THE UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

EVA USA *vs.* BOARD DIRECTORS
4:23-CV-00214-OBP

ON THE CONTINUUM U.S. EEOC
CHARGE #450-2021-03660
ENTERED SARBANES-OXLEY DEFAULT
INJUNCTIVE RELIEF RETALIATION
FRAUDULENT CONVEYANCE
TRANSACT TRANSPORT SECURITIES
12 U.S.C. §5531

DODD-FRANK COMPLAINT
18 U.S.C. §§2311, 2312, 2313, 2314, 2315

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DODD-FRANK COMPLAINT
18 U.S.C. §§2311, 2312, 2313, 2314, 2315

BEFORE THE TRANSFEREE COURT SUA SPONTE ORDER
(DKT#56) SUPERSEDES ALL¹ PREREQUISITE, LIMITATION,
REQUIREMENT IF ANY, COMES the United States, its
Securities Exchange Commission (SEC) and *Commodity*
Futures Trading Commission (CFTC) hereinafter collectively
"COMMISSIONS" ex rel PLAINTIFF entered default^{2,3}
setforth this Complaint against naming DEFENDANTS
allegation said following:

I. SUMMARY

1. From at least October 24, 1991 (*See*, e.g., EXHIBIT-1,
USDC-DDEL CAUSE# 22-112) through this date that
"COMMISSIONS" proceeding entitled this DODD-FRANK
COMPLAINT until this complaint date, whereat the naming
defendants and whomever being-had-been manipulative,
deceptive, or other fraudulent device or contrivance the
"EVA AIRWAYS CORPORATION" as a "DELAWARE
CORPORATION" offer, sale, transact transport securities.

¹ *See*, e.g., *Digital Realty Trust, Inc. v. Somers*, 138 S. Ct. 767 (2018);

² *See*, e.g., DKT#20, #21, #23 (DELAWARE-DEFAULT);

³ *See*, e.g., DKT#54 (TEXAS-DEFAULT);

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INSERTION FOLLOWING PAGE(S)
EXHIBIT-1

DODD-FRANK COMPLAINT
USDC-NDTX-423CV00214-OBP

1803593

STATEMENT AND DESIGNATION
BY
FOREIGN CORPORATION

FILED
In the Office of the Secretary of State
of the State of California

OCT 24 1991

March Fong Eu
MARCH FONG EU, Secretary of State

EVA AIRWAYS CORPORATION

(Name of Corporation)

a corporation organized and existing under the laws of Taiwan
(State or Place of Incorporation)
makes the following statements and designation:

1. The address of its principal executive office is Evergreen Building,
330 Minsheng East Road, Taipei, Taiwan, R.O.C.

(Insert complete address of principal executive office wherever located.)
DO NOT USE POST OFFICE BOX

2. The address of its principal office in the State of California is _____
320 South Centre Street, San Pedro, California 90731

(Insert complete address of principal office in California.)
DO NOT USE POST OFFICE BOX

DESIGNATION OF AGENT FOR SERVICE OF PROCESS WITHIN THE STATE OF CALIFORNIA

3. (Use this paragraph if the process agent is a natural person.)

_____ ,
a natural person residing in the State of California, whose complete address is _____

DO NOT USE POST OFFICE BOX

is designated as its agent upon whom process directed to the corporation may be served within the State of California in the manner provided by law.

(FORM TO BE COMPLETED ON REVERSE SIDE)

4. (Use this paragraph if the process agent is a corporation)

C-T CORPORATION SYSTEM, a corporation organized and existing under the laws of DELAWARE is designated as agent upon whom process directed to the undersigned corporation may be served within the State of California, in the manner provided by law.

NOTE: Before it may be designated by an foreign corporation as its agent for service of process, a corporate agent must comply with Section 1505, California Corporations Code. (See instruction 2.)

5. The undersigned corporation hereby irrevocably consents to service of process directed to it upon the agent designated above, and to service of process on the Secretary of State of the State of California if the agent so designated or the agent's successor is no longer authorized to act or cannot be found at the address given.

EVA AIRWAYS CORPORATION

(Name of Corporation)


(Signature of Corporate Officer)

C.E. Lin, Executive Vice President
(Typed Name and Title of Officer Signing)

INSTRUCTIONS:

1. There must be annexed to this statement, a certificate by an authorized public official of the state or place of incorporation of the corporation, to the effect that the corporation making the statement is an existing corporation in good standing in that state or place. IF A NONPROFIT CORPORATION IS TO BE QUALIFIED, the certificate must also indicate that the corporation is a nonstock, nonprofit corporation.

2. No domestic corporation may be designated as agent for service of process unless it has filed with the Secretary of State the certificate provided for by Section 1505, California Corporations Code (CCC), and no foreign corporation may be designated unless it has qualified for the transaction of intrastate business in California and has filed with the Secretary of State of the State of California the certificate provided for by Section 1505, CCC. A domestic or foreign corporation must be currently authorized to engage in business in this State and be in good standing status on the records of the Secretary of State of the State of California, in order to file a certificate pursuant to this section.

NOTE: A CORPORATION CANNOT ACT FOR ITSELF AS AGENT FOR SERVICE OF PROCESS.

3. If a corporation is required to qualify under a D.B.A. (name other than the true corporate name) pursuant to Section 2106(b), CCC, then in the first line of this statement set out the correct corporate name, followed by "which will do business in California as _____," setting forth the D.B.A. in the space indicated. The D.B.A. should not be set out in connection with the corporate name anywhere else in the statement.

4. If the corporation changes its name the corporation must file an Amended Statement by Foreign Corporation. A form may be obtained from the Secretary of State.

TRANSLATION

BUSINESS REGISTERED CERTIFICATE
OF THE GOVERNMENT OF TAIPEI CITY

PERMIT OF REGISTERED FOR BUSINESS OPERATION

Reference No.: Beei Shyh Jian I Gong Sy (78) Tse No.300126

WHEREAS, CHANG, Yung-fa has applied to change the registered items indicated below, and the government of Taipei City has permitted to change the registered items and indicated below.

1. Name of the company: EVA Airways Corporation
2. Paid-in capital amount : NT\$3,500,000,000.
3. Name of legal representative: CHANG, Yung-fa
4. Organization : Corporation
5. Registered office address: 7F., 330, Minsheng E. Road, 10444, Taipei, Taiwan, R.O.C.(For office use only)
6. Date of registration of the company : 11th April, 1989
7. Business engaged in by the company : (The operation of the below business should be conducted in accordance with the laws and regulations concerned.)
 - a. Grade-A civil aviation transport business.
 - b. Air transport agency business, including business, operation and maintenance, etc.
 - c. Repair and maintenance of airframes, power plants and navigation instruments, etc.
 - d. Sales of aircraft equipments.
 - e. Flight catering business.
 - f. Publication of air travel magazines.
 - g. Imports and exports trade business (not including the futures).
 - h. Operation and investment in other companies relating to the above business (which is permitted by the Investment Commission of the Ministry of Economic Affairs).

This Eighteen day of January in the year One Thousand Nine Hundred and Ninety One.

(Official Seal)

I CERTIFY THAT THIS TRANSLATION
IS A TRUE AND CORRECT ENGLISH
VERSION OF THE ATTACHED ORIGINAL
TO THE BEST OF MY KNOWLEDGE AND
BELIEF

Translator: *Howard Lu*

(Signed)

Mayor of Taipei City
HWANG, Dah-jou

本文件之簽名或蓋章，經中華民國台灣
台北地方法院公証處公証人認証。
公証人 楊昭國

Attested on this 18 day, Jan, 1991
19__, at the Taiwan Taipei District
court, Republic of China, That the
signature(s)/seal(s) in this docu-
ment is/are authentic.

Jen Tzu No. 31276

Yang, Jan Gwo
Notary Public

臺北市政府營利事業登記證

北市建一公司(78)字第 300126 號

據 張榮發 申請營利事業 變更 登記

本府已予登記特發給登記證並摘錄事項如左：

- 一、營利事業名稱：長榮航空股份有限公司
- 二、資本額：新台幣叁拾伍億元整
- 三、負責人：張榮發
- 四、組織：公司
- 五、營業所在地：中山區民生東路三〇號七樓 營業所在地限
營業辦公室使用
- 六、核准設立登記日期：中華民國七十八年四月十一日
- 七、營業項目：

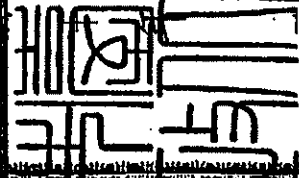
左列業務之經營應遵照有關法令規定辦理

1. 申請民用航空運輸業務。
2. 營運業務代理包括營運維修等。
3. 機體發動機航機及有關零件等之保養及修理。
4. 飛機設備之銷售。
5. 空中服務業務。
6. 有關航空證之發行。
7. 一般進出口貿易業務(期貨除外)。
8. 前各項有關業務之經營及轉投資(以經濟部投資審議委員會核准者為限)。

市長 黃大洲

中華民國

月 十八 日



CERTIFICATE OF INCORPORATION

Ministry of Economic Affairs
Republic of China

Date : January 10, 1991
Uniform Invoice Number: 23225229

Whereas, EVA Airways Corporation has applied for amendment registration, this Ministry has caused such to be registered.

Now, therefore, this Certificate of Incorporation is hereby issued with excerpt from registered items as follow:

1. Name of the company : EVA Airways Corporation
2. Amount of capital : NT\$10,000,000,000 divided into 1,000,000,000 shares at NT\$10 each, and NT\$3,500,000,000 of capital stock has been actually paid.
3. Name of legal representative: Chang, Yung-Fa
4. Location of the company's head office:
7F., 330, Minsheng E. Rd., 10444
Taipei, Taiwan, R.O.C.
5. Date of registration of the company: April 7, 1989
6. Business engaged in by the company :
 - a. Grade-A civil aviation transport business.
 - b. Air transport agency business, including business, operation and maintenance, etc.
 - c. Repair and maintenance of airframes, power plants and navigation instruments, etc.
 - d. Sales of aircraft equipments.
 - e. Flight catering business.
 - f. Machine and spare parts processing manufacture.
 - g. Publication of air travel magazines.
 - h. Imports and exports trade business (not including the futures).
 - i. Operation and investment in other companies relating to the above business (which is permitted by the Investment Commission of The Ministry of Economic Affairs).

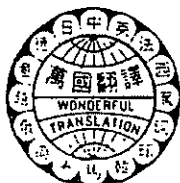
The operation of the above business should be conducted in accordance with the laws and regulations concerned.

Minister of Economic Affairs
Hsiao, Wan-Chang

Director of Commerce Department
Wu, Ching-Tang

萬國翻譯有限公司
WONDERFUL TRANSLATION SERVICE
I CERTIFY THAT THIS TRANSLATION IS A TRUE
AND CORRECT ENGLISH VERSION OF THE ATTACHED
ORIGINAL TO THE BEST OF MY KNOWLEDGE AND
BELIEF.

TRANSLATOR: *Wendy Lin*



Wonderful Translation Service

萬國翻譯有限公司 代理、公證
政府立案

台北市南京東路2段20號3F
20, NANKING E. RD., SEC. 2, TAIPEI
(新東陽食品樓上)

☎ 511-8765 • 511-8745
FAX: 02-511-8745



本文件之簽名或蓋章，經中華民國台灣台北地方法院公証處公証人親證。
Attested on this 14 day, FEB, 1991, at the Taiwan Taipei District Court, Republic of China, That the signature(s)/seal(s) in this document is/are authentic.
Jen Tau No. 0858
Tsai, Chiang-Song
Notary Public

經濟部公司執照

長榮航空股份有限公司

申請公司變更登記

本部准予登記特發給執照並摘錄登記事項如左

一、公司名稱：長榮航空股份有限公司

二、資本：資本總額新台幣壹佰億元分為壹拾億股每股壹拾元
實收資本總額新台幣叁拾伍億元整

三、代表人：董事長張榮發

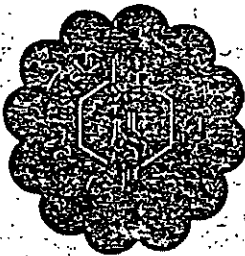
四、公司所在地：台北市民生東路二二〇號一樓

五、核准設立登記日期：中華民國七十八年四月一日

六、所營事業：

1. 甲種民用航空運輸業務。
2. 空運業務代理，包括營業貨運、維修等。
3. 機體、發動機、航儀及有關機件等之保養及修護。
4. 飛機設備之銷售。
5. 空中廚房業務。
6. 機械零件加工製造。
7. 有關航空雜誌之發行。
8. 一般進出口貿易業務（期貨除外）。
9. 前各項有關業務之經營及轉投資（以經濟部投資審議委員會核准者為限）。

上開業務之經營應遵照有關法令規定辦理。



中華民國

部

長

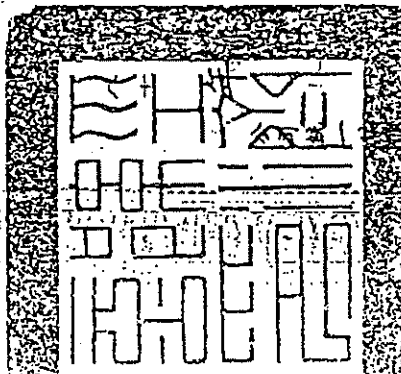
蕭萬長
吳慶堂

商業司司長

委員會代發

月 十 日

23225229



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EXHIBIT-1
INSERTION END-PAGE

DODD-FRANK COMPLAINT
USDC-NDTX-423CV00214-OBP

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1 2. Defendants being-had-been unlawfully transported or
2 caused to be transported in interstate or foreign commerce
3 each transaction goods, wares, merchandise, securities, or
4 money have a value of \$5,000 or more which are "*stolen,*
5 *converted or taken by fraud*"⁴ on the benefit of fraudulent
6 manipulative, deceptive, or other fraudulent device or
7 contrivance the "EVA AIRWAYS CORPORATION" as a
8 "DELAWARE CORPORATION" offer, sale and transact to
9 transport securities.

10
11 **II. VIOLATIONS**
12

13 3. *Securities Act of 1933*, Sec. 11. (a) in this case any part of
14 the registration statement, when such part became
15 effective, contained an untrue statement of a material fact
16 or omitted to state a material fact required to be stated
17 therein or necessary to make the statement therein not
18 misleading, any person acquiring such security unless it is
19 proved that at the time of such acquisition he know of such

⁴ "*stolen, converted or taken by fraud*" is intended to cover all forms of theft offenses regardless of whether such "taking" was in the nature of common law larceny, an embezzlement, or false pretenses. *See, e.g., United States v. Lyda*, 279 F. 2d 461 (5th Cir. 1960). *See also, United States v. Turley*, 352 U.S. 407 (1957) (under 18 U.S.C. §2312); and *Bell v. United States*, 462 U.S. 356 (1983) (under 18 U.S.C. §2313). The property must retain its stolen character during the transportation under 18 U.S.C. §2314, or the receipt, possession, concealment, storing, bartering, selling, disposing of, pledging, or accepting as security for a loan under 18 U.S.C. §2315.

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1 untruth or omission may, either at law or in equity, in any
2 court to competent jurisdiction, sue -

3 (1) every person who signed the registration statement;

4 (2) every person who was a director of (or person
5 performing similar functions) or partner in, the issuer at
6 the time of the filing of the part of the registration
7 statement with respect to which his liability is asserted;

8 (3) every person who, with his consent, is named in the
9 registration statement as being or about to become a
10 director, person performing similar functions, or partner;

11 (4) every account, engineer, or appraiser, or any person
12 whose profession gives authority to a statement made by
13 him, who has with his consent been named as having
14 prepared or certified any part of the registration statement,
15 or as having prepared or certified any report or valuation
16 which is used in connection with the registration statement,
17 with respect to the statement in such registration state,
18 report, or valuation, which purports to have been prepared
19 or certified by him;

20
21 4. *Securities Act of 1933*, Sec. 17. (a) it shall be unlawful for
22 any person in the offer or sale any securities by the use of
23 any means or instruments of transportation or
24 communication in interstate commerce or by the use of the
25 mails, directly or indirectly -

26 (1) to employ any device, scheme, or artifice to defraud, or
27 (2) to obtain money or property by means of any untrue
28 statement of material fact or any omission to state a
29 material fact necessary in order to make the statements
30 made, in the light of the circumstances under which they
31 were made, not misleading, or

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1 (3) to engage in any transaction, practice, or course of
2 business which operates or would operate as a fraud or
3 deceit upon the purchaser. (b) it shall be unlawful for any
4 person, by the use of any means or instruments of
5 transportation or communication in interstate commerce
6 or by the use of the mails, to publish give publicity to, or
7 circulate any notice, circular, advertisement, newspaper,
8 article, letter, investment service, or communication which,
9 though not purporting to offer a security for sales,
10 describes such security for a consideration received or to
11 be received, directly or indirectly, from an issuer,
12 underwriter, or dealer, without fully disclosing the receipt,
13 whether past or prospective, of such consideration and the
14 amount thereof.

15
16 5. *Securities Act of 1933, Sec. 23. Unlawful Representations.*
17 Neither the fact that the registration statement for a
18 security has been filed or is in effect with respect thereto
19 shall be deemed a finding by the Commission that the
20 registration statement is true and accurate on its face or
21 that it does not contain an untrue statement of fact or omit
22 to state a material fact, or be held to mean that the
23 Commission has in any way passed upon the merits of, or
24 given approval to, such security. It shall be unlawful to
25 make, or cause to be made, to any prospective purchaser
26 any representation contrary to the foregoing provisions of
27 this section.

28
29 6. *Securities Exchange Act of 1934, Rule 15c1-2, Fraud and*
30 *Misrepresentation.* (a) the term "manipulative, deceptive, or
31 other fraudulent device or contrivance", as used in section

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1 15(c)(1) of the Act, is hereby defined to include any act,
2 practice, or course of business which operates or would
3 operate as a fraud or deceit upon any person. (b) the term
4 "manipulative, deceptive, or other fraudulent device or
5 contrivance", as used in section 15(c)(1) of the Act, is
6 hereby defined to include any untrue statement of a
7 material fact and any omission to state a material fact and
8 any omission to state a material fact necessary in order to
9 make the statements made, in the light of the
10 circumstances under which they are made, not misleading,
11 which statement or omission is made with knowledge or
12 reasonable grounds to believe that it is untrue or
13 misleading. (c) the scope this section shall not be limited
14 by any specific definitions of the term "manipulative,
15 deceptive, or other fraudulent device or contrivance"
16 contained in other rules adopted pursuant to section
17 15(c)(1) of the act.
18

19 7. *Securities Exchange Act of 1934*, Rule 15c1-3.
20 Misrepresentation by Brokers, Dealers and Municipal
21 securities Dealers as to Registration. The term
22 "manipulative, deceptive, or other fraudulent device or
23 contrivance", as used in section 15(c)(1) of the Act, is
24 hereby defined to include any representation by a broker,
25 dealer or municipal securities dealer that the registration
26 of a broker or dealer, pursuant to section 15(b) of the Act,
27 or the registration of a municipal securities dealer
28 pursuant to section 15B(a) of the Act, or the failure of the
29 Commission to deny or revoke such registration, indicates
30 in any way that the Commission has passed upon or
31 approved the financial standing, business, or conduct of

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1 such registered broker, dealer or municipal securities
2 dealer or the merits of any security or any transaction or
3 transactions therein.
4

5 8. *Securities Exchange Act of 1934, Rule 15c1-5. Disclosure of*
6 *Control.* The term "manipulative, deceptive, or other
7 fraudulent device or contrivance", as used in section
8 15(c)(1) of the Act, is hereby defined to include any broker,
9 dealer or municipal securities dealer controlled by,
10 controlling, or under common control with, the issuer of
11 any security, designed to effect with or for the account of a
12 customer any transaction in, or to induce the purchase or
13 sale by such customer of, such security unless such broker,
14 dealer or municipal securities dealer, before entering into
15 any contract with or for such customer for the purchase or
16 sale of such security, discloses to such customer the
17 existence of such control, and unless such disclosure, if not
18 made in writing, is supplemented by the giving or sending
19 of written disclosure at or before the completion of the
20 transaction.
21

22 9. *Securities Exchange Act of 1934, Rule 15c1-6. Disclosure of*
23 *Interest in Distribution.* The term "manipulative, deceptive,
24 or other fraudulent device or contrivance", as used in
25 section 15(c)(1) of the Act, is hereby defined to include any
26 broker, who is acting for a customer or for both such
27 customer and some other person, or of any dealer or
28 municipal securities dealer who receives or has promise of
29 receiving a fee from a customer for advising such customer
30 with respect to securities, designed to effect with or for the
31 account of such customer any transaction in, or to induce

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1 the purchase or sale by such customer of, any security in
2 the primary or secondary distribution of which such
3 broker, dealer or municipal securities dealer is
4 participating or is otherwise financially interested unless
5 such broker, dealer or municipal securities dealer, at or
6 before the completion of each such transaction gives or
7 sends to such customer written notification of the existence
8 of such participation or interest.
9

10 III. NATURE PROCEEDINGS AND RELIEF SOUGHT

11
12 10. The "COMMISSIONS" brings this action pursuant to the
13 authority conferred upon it by Section 20(b) of the
14 *Securities Act*, 15 U.S.C. §77t(b), and Section 21(d)(1) of the
15 *Exchange Act*, 15 U.S.C. §§78 u(d)(1).
16

17 11. The "COMMISSIONS" ex rel PLAINTIFF entered
18 default^{5,6} setforth this Complaint seeks final judgment: (i)
19 ordering permanent injunctions restraining the enjoining
20 naming defendants from again violating the federal
21 securities laws described herein; (ii) ordering naming
22 defendants with prejudgment interest; (iii) ordering
23 naming defendants to pay civil money penalties; and (iv)
24 prohibiting naming defendants from (a) participating,
25 directly or indirectly, in the purchase, offer, or sale of any
26 security, or (b) engaging in activities for purposes of
27 inducing to attempting to induce the purchase, offer, or
28 sale of security by others; that is (v) unless aforementioned

⁵ See, e.g., DKT#20, #21, #23 (DELAWARE-DEFAULT);

⁶ See, e.g., DKT#54 (TEXAS-DEFAULT);

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1 correction, improvement and compensation of imposing
2 such other and further relief as the Court may deem just
3 and appropriate all applicable in reference but not limit to
4 DODD-FRANK ACT; and said,
5

6 IV. DEFENDANTS
7

8 12. "COMMISSIONS" hereby retaining ex rel PLAINTIFF
9 entered default^{7,8} setforth this Complaint predecessor
10 AMEND#1 SARBANES-OXLEY COMPLAINT along its
11 (DKT#17, Page-1, Line-19 through Line-31; naming
12 DEFENDANT#1, DEFENDANT#2; and page-2, Line-2
13 through Line-7, naming DEFENDANT#3) each every
14 naming defendants naming as following:
15

16 DEFENDANT#1 (*Original Unchanged*)
17 Board Directors
18 EVA AIRWAYS CORPORATION
19 2199 Campus Drive,
20 El Segundo, California 90245
21

22 DEFENDANT#2 (*Original Unchanged*)
23 Ms. Donna Culver (Delaware Bar#2983)
24 Mr. Anthony D. Raucci (Delaware Bar#5948)
25 and MORRIS, NICHOLS, ARSHT & TUNNELL, LLP
26 1201 North Market Street
27 POBOX 1347
28 Wilmington, DE 19899

⁷ See, e.g., DKT#20, #21, #23 (DELAWARE-DEFAULT);

⁸ See, e.g., DKT#54 (TEXAS-DEFAULT);

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1 DEFENDANT#3 (*Original Unchanged*)
2 *Mr. Thomas T. Liu (California Bar#115038)*
3 *Ms. Andrea R. Miliano (California Bar#278937)*
4 *and PHILSBURY WINTHROP SHW PITTMAN, LLP*
5 *725 South Figueroa Street, Suite 2800*
6 *Los Angeles, CA 90017-5524*
7

8 DEFENDANT#4 (*Amend with Permission*)
9 *Mr. Jacob T. Fain (Texas Bar#24053747)*
10 *Mr. Stafford P. Brantley (Texas Bar#24104774)*
11 *and WICK PHILLIPS GOULD & MARTIN, LLP*
12 *100 Throckmorton Street, Suite 1500*
13 *Fort Worth, Texas 76102*
14

15 DEFENDANT#5 (*Amend with Permission*)
16 *all corporation known as:*
17 *EVER ECOVE CORP,*
18 *CHARING YANG DEVELOPMENT CO., LTD*
19 *UNI AIRWAYS CORP,*
20 *EVERGREEN INTERNATIONAL CORP,*
21 *TAIWAN HIGH SPEED RAIL CORP,*
22 *EVERGREEN MARINE CORP,*
23 *EVERGREEN INTERNATIONAL STORAGE &*
24 *TRANSPORT CORP,*
25 *EVERGREEN STEEL CORP,*
26 *CHANG YUNG FA FOUNDATION,*
27 *CHANG YUNG FA CHARITY FOUNDATION,*
28 *EVERGREEN SECURITY LTD,*
29 *EVERGREEN AIR CARGO SERVICES CORP,*
30 *EVERGREEN AIRLINE SERVICES CORP,*
31 *EVERGREEN AVIATION PRECISION CORP,*

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1 *HSIN YUNGG ENTERPRISE CORP,*

2 Individually, collectively as whole, and or whomever all
3 individual and or corporate if any, owning of record or
4 beneficially, if known, more than 10 per centum of any
5 class of stock of its issuer, or more than 10 per centum in
6 the aggregate of the outstanding stock of the issuer as of a
7 date within 20 days prior to the filing of the registration
8 statement pursuant *Securities 1933 Act*, Schedule A, (6)
9 specifically mandated (See, e.g., EXHIBIT-19).

10
11 13. "COMMISSIONS" furthermore reserve its indisputable
12 right adding modification any persons, corporation and or
13 both any time in the connection additional defendants
14 naming yet unknown pursuant naming defendants
15 violation *Securities Act of 1933 Regulations*.

16
17
18 V. JURISDICTION AND VENUE
19

20 14. The transferor Court has exclusive subject matter
21 jurisdiction over this action pursuant to Sections 20(b),
22 20(d) and 22(a) of the *Securities Act*, 15 U.S.C. §§77t(b),
23 77t(d), and 77v(a), and Sections 21(d) and 27(a) of the
24 *Exchange Act*, 15 U.S.C. §§78u(d) and 78aa(a) manipulative,
25 deceptive, or other fraudulent device or contrivance as a
26 "DELAWARE CORPORATION" to extravaganza the market,
27 buyer, investors confidence, whereto stolen, converted or
28 taken "DELAWARE CORPORATION" by fraud by offering,
29 sales and transact to transport securities for the purpose
30 unjustly enriched contrivance ill-gotten person gain.
31

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INSERTION FOLLOWING PAGE(S)
EXHIBIT-19

DODD-FRANK COMPLAINT
USDC-NDTX-423CV00214-OBP

-14-

EXHIBIT-19
INSERTION END-PAGE

DODD-FRANK COMPLAINT
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DOW JONES, A NEWS CORP COMPANY About WSJ
Stock 800 46734 NAS 2915795 DJIA 3405170
US 10 Y 2/32 Yield Credit 7592 Euro 10997

WSJ MARKETS

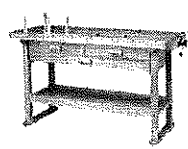
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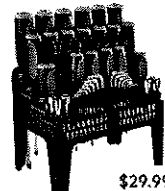
ADVERTISEMENT



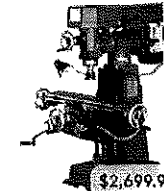
\$199.99




\$59.99



\$29.99



\$2,699.99



\$74.99

HARBOR FREIGHT Your Destination for Tools
QUALITY TOOLS. BUILT TO LAST.

EVA Airways Corp. 2618 (Taiwan)

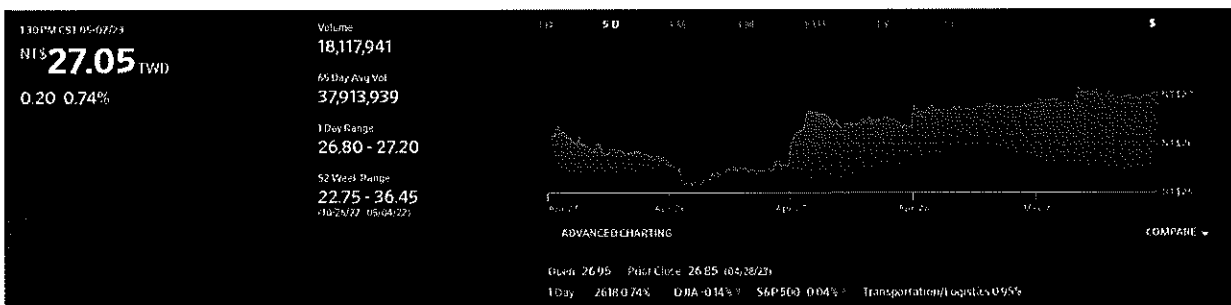


EXHIBIT-19

A

1 VI. STATUTORY LEGAL FRAMEWORK §§2314, 2315

2
3 15. *First*, the elements of offense allegation violation of the
4 offense of 18 U.S.C. §2314 are that the defendants: (1)
5 unlawfully each transact to transport or caused to be
6 transported in interstate or foreign commerce; (2) goods,
7 wares, merchandise, securities, or money have a value of
8 \$5,000 or more which are “*stolen, converted or taken by*
9 *fraud*”⁹; and (3) knowing the same to be stolen, converted
10 or taken by fraud; and,

11
12 16. *Second*, that defendants (4) devised or intended to
13 devise the scheme or artifice to defraud or obtain money or
14 property by false or fraudulent pretenses, representations,
15 or promises; (5) each transact to transported¹⁰ or caused to

⁹ “*stolen, converted or taken by fraud*” is intended to cover all forms of theft offenses regardless of whether such “taking” was in the nature of common law larceny, an embezzlement, or false pretenses. *See, e.g., United States v. Lyda*, 279 F. 2d 461 (5th Cir. 1960). *See also, United States v. Turley*, 352 U.S. 407 (1957) (under 18 U.S.C. §2312); and *Bell v. United States*, 462 U.S. 356 (1983) (under 18 U.S.C. §2313). The property must retain its stolen character during the transportation under 18 U.S.C. §2314, or the receipt, possession, concealment, storing, bartering, selling, disposing of, pledging, or accepting as security for a loan under 18 U.S.C. §2315.

¹⁰ *See, e.g.,* transportation of the victim the essence of this offense, it does not require an actual loss of property by the victim. *United States v. Benson*, 548 F. 2d 42 (2nd Cir. 1977). Government does not have to prove that the victim relied on the false representations and was deceived by them. *United States v. Reina*, 446 F.2d 16 (9th Cir. 1971)

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1 be transported or induced any person to travel in or be
2 transported in interstate or foreign commerce; (6) in the
3 execution or concealment of the alleged each transaction
4 construed scheme or artifice to defraud that person of
5 person of money or property each transaction have a value
6 of \$5,000 or more.

7
8 17. *Third*, that defendants: (7) with unlawful or fraudulent
9 intent; (8) transact to transport or caused to be transported
10 in interstate or foreign commerce; (9) a falsely made,
11 forged, altered, or counterfeit security¹¹ or tax stamps; (10)
12 knowing the same to have been falsely made, forged,
13 altered, or counterfeited.

14
15 18. *Fourth*, that defendants: (11) with unlawful or
16 fraudulent intent; (12) transact to transport or caused to be
17 transported in interstate or foreign commerce; (13) each
18 transaction company check every endorsement bearing
19 forged counterfeit effect.
20
21
22

¹¹ See, e.g., “*forged security*” does not have actually forged before the security crosses a state boundary provided that the forging take place before the completion of the interstate journey. *McElroy v. United States*, 455 U.S. 642 (1982). The defendant does not have to know of the interstate transportation as that is only a jurisdictional element. *United States v. Ludwig*, 523 F. 2d 705 (8th Cir. 1975); also, *United States v. Feola*, 420 U.S. 671 (1975);

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1 19. *Fifth*, that defendants: (14) with unlawful or fraudulent
2 intent; (15) transported or caused to be transported in
3 interstate or foreign commerce; (16) any tool, implement,
4 or thing used or fitted to be used in falsely making, forging,
5 altering, or counterfeiting any security or tax stamp or any
6 part thereof.

7
8 20. *Sixth*, the elements of offense allegation violation of the
9 offense of 18 U.S.C. §2315 are that the defendants: (1)
10 received, possessed, concealed, stored, bartered, sold, or
11 disposed of; (2) goods, wares, merchandise, securities or
12 money having the value of \$5,000 or more; (3) which have
13 crossed a state or United States boundary after being
14 stolen, unlawfully converted, or taken; (4) knowing same
15 to have been stolen, unlawfully converted, or taken.

16
17 21. *Seventh*, the elements of offense allegation violation of
18 the offense of 18 U.S.C. §2315 are that the defendants: (5)
19 received, possessed, concealed, stored, bartered, sold, or
20 disposed of, or pledged or accepted as security or for a
21 loan; (6) falsely made, forged, altered, or counterfeit
22 security or tax stamp; (7) which was moving as, or which
23 was a part of, or which constitutes interstate or foreign
24 commerce; (8) knowing same to have been stolen,
25 unlawfully converted, or taken by means manipulative,
26 deceptive, or other fraudulent device or contrivance the
27 "EVA AIRWAYS CORPORATION" as a "DELAWARE
28 CORPORATION" offer, sale and transact to transport
29 securities.
30
31

1
2
3
4
5
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8

VII. FACTS

22. "DELAWARE CORPORATION" traditionally is the most prestigious brand *equity*¹² of American corporate quality standard or as that if a corporation can have since 1900's. *More*¹³ than half Fortune-500 corporation incorporated in the State Delaware.

¹² See, *BLK LAW*, 4th EDITION. W., PUB. 1965, Page 634, "EQUITY". In its broadest and most general signification, this term denotes the spirit and the habit of fairness, justness, and right dealing which would regulate the intercourse of men with men, the rule of doing to all others as we desire them to do to us; or, as it is expressed by Justinian, "to live honestly, to harm nobody, to render to every man his due." Inst. 1, 1, 3. It is therefore the synonym of natural right or justice.

In a restricted sense, the word denotes equal and impartial justice as between two persons whose rights or claims are in conflict; justice, that is as ascertained by natural reason or ethical insight, but independent of the formulated body of law. This is not a technical meaning of the term, except in so far as courts which administer equity seek to discover it by the agencies above mentioned, or apply it beyond the strict lines of positive law.

In a still more restricted sense, it is a system of jurisprudence, or branch of remedial justice, administered by certain tribunals, distinct from the common law courts and empowered to decree "equity" in the sense last above given. Here it becomes a complex of well-settled and well-understood rules, principles, and precedents.

¹³ See, *WHY CORPORATIONS CHOOSE DELAWARE*, by Lewis S. Black, Jr. Delaware Department of State, 2007.

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1 23. "DELAWARE CORPORATION" *proprietary*¹⁴ is
2 determined based on symbol public trust of free society
3 market economy in accordance the confidence corporation
4 assets or liabilities contemplate the qualification standard
5 above all other generic state corporations.
6

7 24. "EVA AIRWAYS CORPORATION", a Taiwanese
8 corporation, Taiwanese owned and Taiwanese operated on
9 the *International Securities Identification Number* (ISIN-Code)
10 TW0002618006, whereby alleged naming defendants
11 manipulative, deceptive, or other fraudulent device or
12 contrivance their "CORPORATION" as a "DELAWARE
13 CORPORATION" perpetrate-to-extravaganza the market,
14 buyer, investors overcounter confidence for the purpose
15 fraudulent conveyance offering, selling and transacting to
16 transporting securities to wit affect interstate commerce.
17

18 25. The State of Delaware is a leading domicile for U.S. and
19 international business entities, which offers simple process:
20 (1) *Choose Business Entity Type*; (2) *Obtain a Registered Agent*;
21 (3) *Name Reservation*; (4) *Certificate of Incorporation*; (5)
22 *Submitting Certificate For Filing*; (6) *Financial Institution*
23 *Certified Copies Status Good Standing*; (7) *Annual Taxes*
24 *Corporate Annual Report and Franchise Tax Payments*.
25

26 26. Instead of filing "DELAWARE CORPORATION"
27 appropriately, the alleged naming defendants contrary by
28 intentional to file its statement unlawfully with SEC.

¹⁴ *Managing Brand Equity*, Macmillan, Inc., New York, 1991, David
A. Aaker, the J.Gary Shansby Professor , U.C. Berkeley.

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1 27. Since enactment of *Securities Act of 1933*, the Federal
2 law specific SEC enforcement that is mandatory corporate
3 disclosure based on the principle Five Basic Instrumental
4 which absence a compulsory enforced corporate disclosure
5 system: (1) some issuers will conceal or misrepresent
6 information material to investment decision; (2)
7 underwriting costs and insiders salaries and perquisites
8 will be excessive; (3) there will be less "*Public Confidence*"
9 in the markets; (4) Neither state law nor private
10 associations such as *New York Stock Exchange* can ensure
11 the optimal level of corporate disclosure; (5) that civil or
12 criminal law action will be unenforceable.

13
14 28. While at time "EVA AIRWAYS CORPORATION" formed
15 then filed SEC and state record on or about 10-24-1991,
16 that is state "CALIFORNIA" Secretary filed date-time and
17 retained corporation record-file been true and correct, the
18 alleged naming defendants stolen, converted or taken by
19 fraud status "DELAWARE CORPORATION" brand equity by
20 manipulative, deceptive, or other fraudulent device or
21 contrivance knowing intention willfully replacing its
22 "CALIFORNIA" process agent with a "DELAWARE" process
23 agent (*See*, e.g., EXHIBIT-1) in the making, dealing, or
24 possessing counterfeit obligation and or security of the
25 United States subsequent thereafter to being-had-being as
26 of a "DELAWARE CORPORATION" in violation 18 U.S.C.
27 §§470 through 514 (*See*, e.g., EXHIBIT-20);
28
29
30

-21-

INSERTION FOLLOWING PAGE(S)
EXHIBIT-20

DODD-FRANK COMPLAINT
USDC-NDTX-423CV00214-OBP

Statement and Designation by Foreign Corporation

DO NOT WRITE IN THIS SPACE

(Name of Corporation)
a corporation organized and existing under the laws of _____,
(Place or State of Incorporation)

makes the following statements and designation:

1. The address of its principal executive office is _____

(Insert complete address of principal executive office wherever located – Do not use Post Office Box)

2. The address of its principal office in the State of California is _____

(Insert complete address of principal office in California – Do not use Post Office Box.)

DESIGNATION OF AGENT FOR SERVICE OF PROCESS WITHIN THE STATE OF CALIFORNIA

3. *(Use this paragraph if the process agent is a natural person.)*

a natural person residing in the State of California, whose complete ☐ business ☐ residence address is

(Do not use Post office box)

is designated as its agent upon whom process directed to the corporation may be served within the State of California in the manner provided by law.

NOTE: Either the business address or the residence address must be given. Indicate which by check mark in proper box.

FORM TO BE COMPLETED ON REVERSE SIDE

OVER

SEC/STATE Form LL-8

Figure F-53 (continued)

4. *(Use this paragraph if the process agent is a corporation. See instructions)*

_____, a corporation
organized and existing under the laws of _____

is designated as agent upon whom process directed to the undersigned corporation may be served within the State of California, in the manner provided by law.

NOTE: Before it may be designated by any foreign corporation as its agent for service of process, a corporate agent must comply with Section 1505, California Corporations Code. (See instruction 2.)

5. The undersigned corporation hereby irrevocably consents to service of process directed to it upon the agent designated above, and to service of process on the Secretary of State of State of California if the agent so designated or the agent's successor is no longer authorized to act or cannot be found at the address given.

(Name of Corporation)

(Signature of corporate officer)

(Typed name and title of officer signing)

INSTRUCTIONS:

1. There must be annexed to this statement, a certificate by an authorized public official of the state or place of incorporation of the corporation, to the effect that the corporation making the statement is an existing corporation in good standing in that state or place. IF A NONPROFIT CORPORATION IS TO BE QUALIFIED, the certificate must also indicate that the corporation is a nonstock, nonprofit corporation.
2. No domestic corporation may be designated as agent for service of process unless it has filed with the Secretary of State the certificate provided for by Section 1505, Corporations Code, and no foreign corporation may be designated unless it has qualified for the transaction of intrastate business in California and has filed with the Secretary of State of the State of California the certificate provided for by Section 1505, California Corporations Code. A domestic or foreign corporation must be currently authorized to engage in business in this State and be in good standing status on the records of the Secretary of State of the State of California, in order to file a certificate pursuant to this section.

NOTE: A CORPORATION CANNOT ACT FOR *ITSELF* AS AGENT FOR SERVICE OF PROCESS.

3. If a corporation is required to qualify under a D.B.A. (name other than the true corporate name) pursuant to Section 2106(b), Corporations Code, then in the first line of this statement set out the correct corporate name, followed by "which will do business in California as _____," setting forth the D.B.A. in the space indicated. The D.B.A. should not be set out in connection with the corporate name anywhere else in the statement.
4. If the corporation changes its name or if there are any changes in the information contained in this statement, then the corporation must file an Amended Statement and Designation. A form may be obtained from the Secretary of State.

Figure F-53 (continued)



HANDBOOK OF ANNOTATED FINANCIAL FORMS

Robert P. Vichas

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EXHIBIT-20
INSERTION END-PAGE

DODD-FRANK COMPLAINT
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1 29. The "COMMISSIONS" not only finding the alleged
2 naming defendants stolen, converted or taken by fraud the
3 status "DELAWARE CORPORATION" brand equity by
4 manipulative, deceptive, or other fraudulent device or
5 contrivance extraneous personal financial gaining, but it is
6 further based on the continuance finding from other
7 agencies commissions charged labor law violation (*See*, e.g.
8 U.S. EEOC CHARGE #450-2021-03660, dated 07-19-2021).

9
10 30. Subsequent to the relevant other agencies commissions
11 permission to sue letter (*See*, e.g., DKT#1, APPENDIX-8, U.S.
12 EEOC-CHARGE, *Notice Right to Sue*, dated 11-17-2021) so
13 that PLAINTIFFS original court proceeding before *United*
14 *States District Court for the District Delaware* filed on
15 01-27-2022 (*See*, e.g., DKT#1, PLAINTIFFS entitled
16 SARBANES-OXLEY COMPLAINT).

17
18 31. On the date 02-04-2022, that PLAINTIFFS respectfully
19 placing the cause summons and complaint filed pending
20 before the United States District Court for the District
21 Delaware into the *United States Postal Service*
22 (TRACKING#EJ687507625US) to been delivered to
23 "DELAWARE" process agent in the accordance the alleged
24 naming defendants manipulative, deceptive, or other
25 fraudulent device or contrivance knowing intention
26 willfully replacing its "CALIFORNIA" process agent onto
27 the filed SEC and state record on or about the date
28 10-24-1991 (*See*, e.g., EXHIBIT-1).

29
30

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1 32. On the date 02-09-2022, the alleged naming defendants
2 manipulative, deceptive, or other fraudulent device or
3 contrivance the "DELAWARE" process agent by decline,
4 refusal to reject clearly indicating by denounce that "EVA
5 AIRWAYS CORPORATION" is not listed as service
6 processable on the records of the State of Delaware, that
7 defendants manipulative, deceptive, or other fraudulent
8 device or contrivance its "DELAWARE" process agent on
9 the SEC and state file record whom unable to forward, or
10 simply doesn't exist (*See*, e.g., EXHIBIT-18, "EVA AIRWAYS
11 CORPORATION is not listed on our records or on the records of
12 the State of DE. CT was unable to forward", dated 02-09-2022,
13 Post Marked date 02-11-2022).

14
15 33. Whereby incorporate aforementioned PARAGRAPH #28
16 through PARAGRAPH #32 record fact shown the above,
17 that the alleged naming defendants manipulative,
18 deceptive, or other fraudulent device or contrivance its
19 "DELAWARE" process agent onto its SEC and state file
20 record disclosure statement manifested "DELAWARE" that
21 is absolute have no record of whatsoever within any
22 meaningful or any connection to the state "DELAWARE",
23 which other than uttering fraudulent device or contrivance
24 perpetrate-to-extravaganza the market, buyer, investors
25 overcounter confidence for the purpose fraudulent
26 conveyance offering, selling and transacting to
27 transporting securities to wit affect interstate commerce by
28 stolen, converted or taken by fraud the status "DELAWARE
29 CORPORATION" brand equity.
30
31

-25-

1 34. On the date 02-09-2022, the PLAINTIFF been-had-being
2 reported to the cause summons and complaint filed
3 pending before the *United States District Court for the*
4 *District Delaware* concerning invalidity the alleging naming
5 defendants manipulative, deceptive, or other fraudulent
6 device or contrivance its "DELAWARE" process agent onto
7 its SEC and state file record disclosure statement
8 manifested "DELAWARE" that is absolute have no record of
9 whatsoever within any meaningful or any connection to
10 the state "DELAWARE" (*See, e.g., APPENDIX-31, PLAINTIFF*
11 *entitled AFFIDAVIT OF SERVICE, DKT#6, dated 02-09-2022,*
12 *USPS TRACKING#EJ687507642US*).

13
14 35. On the date 04-01-2022, the PLAINTIFF been-had-being
15 amend to its original SARBANES-OXLEY COMPLAINT
16 based on FRCP, Rule 15(a)(2) as justice so requires rules
17 and MRPC, Rule 3.3 because court record material fact
18 alleged the naming defendants specific DEFENDANT#1, #2,
19 #3 committed act of (*See, e.g., APPENDIX-32, AMEND#1*
20 *SARBANES-OXLEY COMPLAINT, DKT#17*):

21
22 (1) Falsification, alters, destroys, mutilates, or conceals
23 corporate record to impending an official proceeding
24 violation 18 U.S.C. §1512 (*See, e.g., AMEND#1*
25 *SARBANES-OXLEY COMPLAINT, DKT#17, Page-2,*
26 *Line-28*); and

27
28 (2) Perjury before court, agencies, and or grand jury
29 proceeds 18 U.S.C. §1621 (*See, e.g., See, e.g., AMEND#1*
30 *SARBANES-OXLEY COMPLAINT, DKT#17, Page-6,*
31 *Line-1*);

-26-

1 (3) Subornation of perjury violation 18 U.S.C. §1622
2 (*See*, e.g., AMEND#1 SARBANES-OXLEY COMPLAINT,
3 DKT#17, Page-9, Line-1);
4

5 (4) Obstruction justice violation 18 U.S.C. §§1503, 1505
6 (*See*, e.g., AMEND#1 SARBANES-OXLEY COMPLAINT,
7 DKT#17, Page-10, Line-1);
8

9 (5) Conspiracy violation 18 U.S.C. §371 (*See*, e.g.,
10 AMEND#1 SARBANES-OXLEY COMPLAINT, DKT#17,
11 Page-11, Line-1);
12

13 (6) Furtherance mail fraud vicarious liability
14 deprivation intangible right of honest services
15 violation 18 U.S.C. §1341 (*See*, e.g., AMEND#1
16 SARBANES-OXLEY COMPLAINT, DKT#17, Page-11,
17 Line-15);
18

19 (7) Aiding and abetting violation 18 U.S.C. §2 (*See*, e.g.,
20 AMEND#1 SARBANES-OXLEY COMPLAINT, DKT#17,
21 Page-12, Line-1);
22

23 (8) False declarations violation 18 U.S.C. §152(3) (*See*,
24 e.g., AMEND#1 SARBANES-OXLEY COMPLAINT,
25 DKT#17, Page-12, Line-16);
26

27 36. Subsequent on the date 06-09-2022 the PLAINTIFF
28 been-had-being respectfully filed its entitled AFFIDAVIT OF
29 SERVICE AMEND#1 SUPPORT LEAVE APPLICATION TO FILE
30 PLAINTIFFS THIRD MOTION (*See*, e.g., DKT#19), which
31 contains each "MOTION-[3.1] FOR ENTERING A DEFAULT

-27-

1 AND JUDGMENT BY CLERK OF COURT" and "MOTION-[3.2]
2 FOR ENTERING A DEFAULT AND JUDGMENT BY CLERK OR
3 COURT" known DELAWARE-DEFAULT. Court should note
4 the file-date reasonable within extension that PLAINTIFFS
5 been-had-being properly notice and acknowledge by grant
6 of the court (*See*, e.g., DKT#14, PLAINTIFFS entitled
7 PLAINTIFFS FIRST MOTION-[1] TO MANAGING PLEADING
8 FOR APPLICATION ENLARGEMENT, dated 03-14-2022).

9
10 37. Reallege PARAGRAPH #28 through #36 the court
11 record material fact, that is because the allege defendants
12 alleging the naming defendants manipulative, deceptive,
13 or other fraudulent device or contrivance its "DELAWARE"
14 process agent onto its SEC and state file record disclosure
15 (*See*, e.g., EXHIBIT-1) and its corporate statement whereat is
16 absolute have no record of whatsoever within any
17 meaningful or any connection to the state "DELAWARE",
18 so that PLAINTIFF properly respectfully serviced the
19 alleging the naming defendants to their last known good
20 attorneys whom otherthan the defendants "process agent"
21 and based on the fact defense fraudulent claimed
22 "DELAWARE" process agent confirmed its fraudulent
23 device or contrivance (*See*, e.g., EXHIBIT-18, "EVA AIRWAYS
24 CORPORATION is not listed on our records or on the records of
25 the State of DE. CT was unable to forward", dated 02-09-2022,
26 Post Marked date 02-11-2022).

27
28 38. Attachment to "COMMISSIONS" this Complaint, it is
29 PLAINTIFF entitled AFFIDAVIT OF SERVICE AMEND#1
30 SUPPORT LEAVE APPLICATION TO FILE PLAINTIFFS THIRD
31 MOTION (*See*, e.g., DKT#19), which contains each

-28-

INSERTION FOLLOWING PAGE(S)
EXHIBIT-18

DODD-FRANK COMPLAINT
USDC-NDTX-423CV00214-OBP

CT

February 09, 2022

MS. FLORA HOT
3808 CREEK HOLLOW WAY,
THE COLONY, TX 75056-4086

EVA USA EX REL FLORA HOI vs. BOARD DIRECTORS

Case No. 22112

Dear Sir/Madam:

EVA AIRWAYS CORPORATION is not listed on our records or on the records of the State of DE.

CT was unable to forward.

Very truly yours,

The Corporation Trust Company

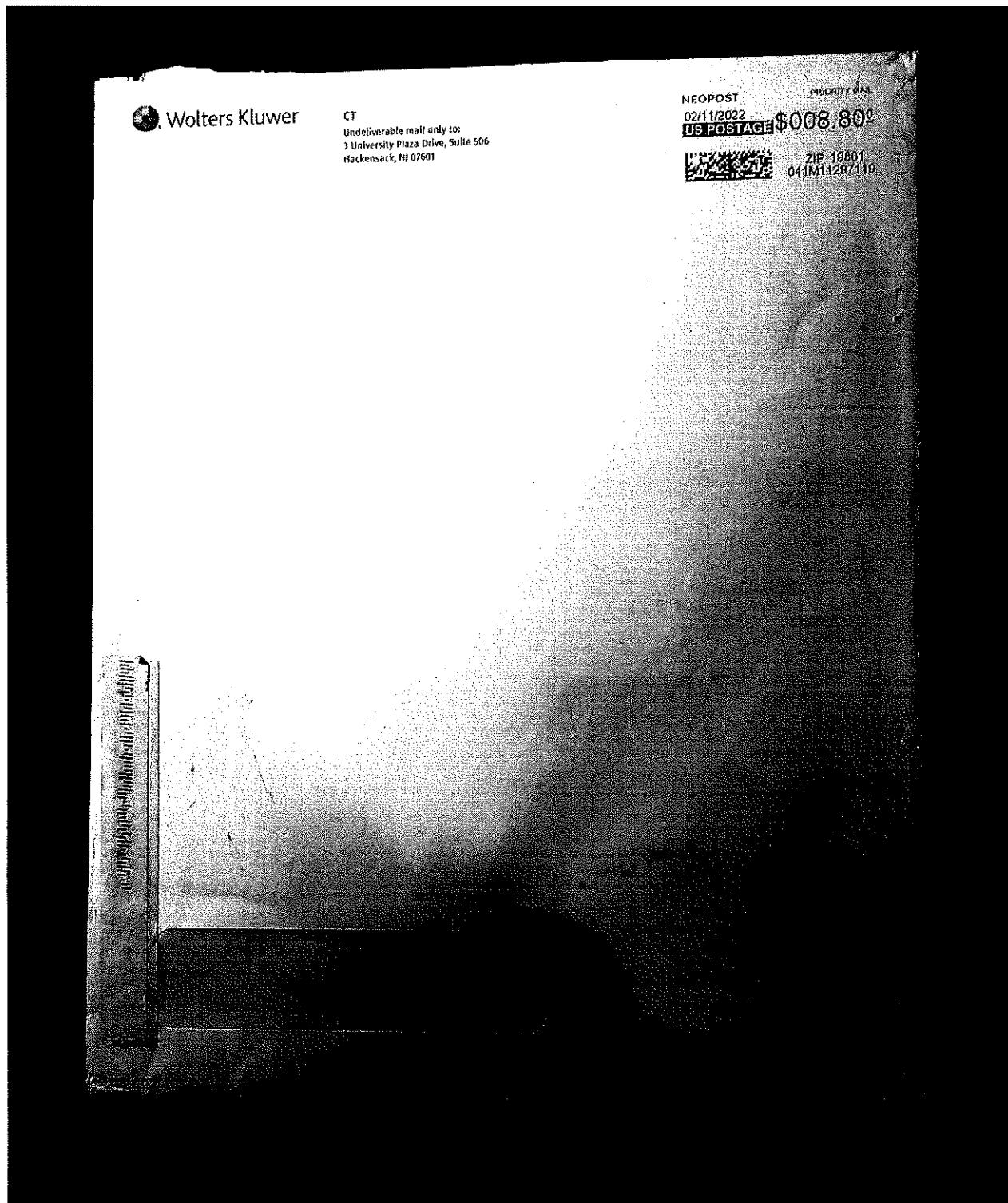
Log# 541025024

Sent By Regular Mail

cc: --

(Returned To)

MS. FLORA HOT
3808 CREEK HOLLOW WAY,
THE COLONY, TX 75056-4086



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EXHIBIT-18
INSERTION END-PAGE

DODD-FRANK COMPLAINT
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1 "MOTION-[3.1] FOR ENTERING A DEFAULT AND JUDGMENT
2 BY CLERK OF COURT" and "MOTION-[3.2] FOR ENTERING A
3 DEFAULT AND JUDGMENT BY CLERK OR COURT" known
4 DELAWARE-DEFAULT, which been-had-being properly
5 served the alleging the naming defendants specific and
6 their last known good attorneys whom otherthan the
7 defendants "process agent" and based on the fact defense
8 claims "DELAWARE PROCESS AGENT" confirmed its
9 fraudulent device or contrivance as following:

10 DEFENDANT#1(USPS-TRACKING#EJ141522579US);

11 DEFENDANT#2(USPS-TRACKING#EJ141522582US);

12 DEFENDANT#3(USPS-TRACKING#EJ141521998US);

13 that each the same record of tracking the above
14 USPS-TRACKING reference which shown record of validity
15 of service pursuant to FRCP, Rule 4(l)(3). Court may permit
16 proof of service to be amended (See, e.g., APPENDIX-33,
17 PLAINTIFFS 19TH FILE-[19] AFFIDAVIT AMEND RECORD OF
18 SERVICE DKT#19, #20, #21).

19
20 39. Whereat that is based the material fact record on or
21 about 10-24-1991 commencing the above paragraphs, the
22 state "CALIFORNIA" Secretary filed date-time and retained
23 corporation record-file been true and correct, that the
24 alleging defendants did stolen, converted or taken by
25 fraud the word "DELAWARE", and or status "DELAWARE
26 CORPORATION" brand equity by manipulative, deceptive,
27 or other fraudulent device or contrivance
28 perpetrate-to-extravaganza the market, buyer, investors
29 overcounter confidence for the purpose fraudulent
30 conveyance offering, selling and transacting to
31 transporting securities to wit affect interstate commerce by

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1 transact, transport proceed by or onto the subsequent
2 stolen transportations within meaning 18 U.S.C. §2311
3 specific defined as "*motor vehicles, aircrafts, vessels*".
4

5 40. The alleged naming defendants and or whoever
6 transports in interstate foreign commerce on a motor
7 vehicle, vessel, or aircraft, knowing on the same to have
8 been stolen, is violation 18 U.S.C. §2312 Transact onto the
9 Stolen Transportation Vehicles; and,
10

11 41. The alleged naming defendants and or whoever (a)
12 receives, possesses, conceals, stores, barter, sells, or
13 dispose on the transact of any motor vehicles, vessels, or
14 aircrafts, which has crossed a state or United States on the
15 same, is violation 18 U.S.C. §2313; and,
16

17 42. The alleged naming defendants and or whomever
18 transact, transports, transmits, or transfers in interstate or
19 foreign commerce any goods, wares, merchandise,
20 securities or money, of the value of \$5,000 or more,
21 knowing the same to have been stolen, converted or taken
22 by fraud; and,
23

24 43. Having devised or intending to devise any scheme or
25 artifice to defraud, or for obtaining money or property by
26 means of false or fraudulent pretenses, representations, or
27 promises, transports or causes to be transported, or
28 induces any person or persons to travel in, or to be
29 transported in interstate or foreign commerce in the
30 execution or concealment of a scheme or artifice to defraud

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1 that person or those persons of money or property having
2 a value of \$5,000 or more; and,

3
4 with unlawful or fraudulent intent, transports in interstate
5 or foreign commerce any falsely made, forged, altered, or
6 counterfeited securities or tax stamps, knowing the same
7 to have been falsely made, forged, altered, or
8 counterfeited;

9 It is violation 18 U.S.C. §2314;

10
11 44. The alleged naming defendants and or whoever
12 transact, transports,

13
14 (1) traffics in goods or services and knowingly uses a
15 counterfeit mark on or in connection with such goods or
16 services,

17 (2) traffics in labels, patches, stickers, wrappers, badges,
18 emblems, medallions, charms, boxes, containers, cans,
19 cases, hangtags, documentation, or packaging of any type
20 or nature, knowing that a counterfeit mark has been
21 applied thereto, the use of which is likely to cause
22 confusion, to cause mistake, or to deceive,

23 It is violation 18 U.S.C. §2320;

24
25
26 45. The "COMMISSIONS" reallege and incorporates by
27 reference herein the allegations in PARAGRAPH #1
28 through PARAGRAPH #44:

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VIII. FIRST (1st) CLAIM FOR RELIEF
Racketeer Influenced Corrupt Organization
(Violation of 18 U.S.C. §§1961-1968)

46. Whereby the effect alleged naming defendants and or whomever failure to deny, failure specific denial constituted admission the PLAINTIFF reentered the DELAWARE-DEFAULT before the *United States District Court for the District Delaware* (*See, e.g., DKT#23*), the "COMMISSIONS" ex rel PLAINTIFFS aforementioned entered reentered default allegation defendants violations hereby consolidate 18 U.S.C. §2, 152(3), 371, 1341, 1503, 1505, 1512, 1621, 1622 (*See, e.g., DKT#17*) alleging material default record shown evidence in the pattern certain predicate act (a) racketeering violations; (b) record existence enterprise; (c) the pattern of racketeering activity; (d) transact transport engaged interstate and or foreign commerce collectively violation of 18 U.S.C. §§1961-1968 the *Racketeer Influenced and Corrupt Organizations Act*; and,

47. "COMMISSIONS" ex rel PLAINTIFFS aforementioned retained court record indicating defendants material evidence "partnership" between legal entitles aiding abetting the racketeering predicate act pursuant *Federal Rules of Evidence* (FRE) , Rule 79 and *Federal Rules of Criminal Procedure* (FRCrP), Rule 49 defendants specific court record (DKT#50) disclosure reveals the "partnership" which otherthan attorney-client privileged relations outline admission of association the racketeering influence and corruptive unlawful affiliations (*See, e.g., DKT#50, File*

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1 date 03/29/2023, Page 1 of 2, Page ID 768, ¶2, neglect line
2 numbers, "*Pillsbury partnered with Morris Nichols*",
3 "*Pillsbury partnered with Wick Phillips*") the word
4 "*partnered*" is state of mind evidence defendants motive,
5 opportunity, intent, preparation, plan, knowledge, identity,
6 absence of mistake, and lack of accident participation, the
7 pattern of racketeering activities violation in reference to
8 *Federal Rules of Evidence* (FRE), Rule 404; and,
9

10 48. By their conduct described above, the alleged naming
11 defendants and or whomever liability be treble:
12

13 **IX. SECOND (2nd) CLAIM FOR RELIEF**

14 Fraud in Offer, Sale, Transact Transport Securities
15 (Violation of Section 17(a) of the Securities Act)
16

17 49. Incorporate FIRST CLAIM above, the alleged naming
18 defendants and or whomever, in the offer or sale of
19 securities, by the use of means or instrumentalities transact
20 transportation communication in interstate commerce or
21 by use of the mails, directly or indirectly in the any
22 connection "*EVA AIRWAYS CORPORATION*" to the name
23 alleged corporate statement: (1) knowingly or recklessly
24 employed such devices, schemes, or artifices to defraud; (2)
25 knowingly, recklessly, or negligently obtained money or
26 property by means of untrue statements of material or by
27 omitting to state material facts necessary in order to make
28 the statements made, in light of circumstances under
29 which they were made, not misleading; and (3) knowingly,
30 recklessly, or negligently engaged in transactions,
31 transport, practice, or courses of business which operated

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1 or would operated as fraud or deceit upon the purchaser.
2 That the alleged naming defendants and or whomever
3 violated, and unless restrained and enjoined will continue
4 to violate, *Securities Act* Section 17(a), 15 U.S.C. §77q(a).
5

6 **X. THIRD (3rd) CLAIM FOR RELIEF**

7 Fraud in Connection with the Purchase or Sale Securities
8 (Violations of Section 10(b) of the *Exchange Act* and Rule
9 10b-5 Thereunder)
10

11 50. Reincorporate FIRST CLAIM above, the alleged naming
12 defendants and or whomever, in connection with the
13 purchase or sale of securities, by the use of the means or
14 instrumentalities of transact transportation communication
15 in interstate commerce or by use of the mails, directly or
16 indirectly with the "EVA AIRWAYS CORPORATION" to the
17 name alleged corporate statement or of the mails, or of any
18 facility of any national securities exchange, knowingly or
19 recklessly, (i) employed devices, schemes, or artifices to
20 defraud; (ii) made untrue statements of material fact or
21 omitted to state a material fact necessary in order to make
22 the statements made, in the light of the circumstances
23 under which they were made, not misleading; and (iii)
24 engaged in acts, transact, transport, practices, or courses of
25 business which operated or would operate as fraud or
26 deceit upon any persons, including purchasers of the
27 securities thereof.
28

29 51. By their conduct described above, the alleged naming
30 defendants and or whomever violated, and unless
31 restrained and enjoined will continue to violate, *Exchange*

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1 Act Section 10(b), 15 U.S.C. §78j(b), and Rule 10b-5, 17
2 C.F.R. 240.10b-5, Thereunder.

3
4
5 **XI. FOURTH (4th) CLAIM FOR RELIEF**

6 Defendants Control Person Liability Under Section 20(a) of
7 the Exchange Act for Violation of Section 10(b) of the
8 Exchange Act and Rule 10b-5 Thereunder
9

10 52. The alleged naming defendants and or whomever is, or
11 was directly or indirectly, a control person persons of the
12 "EVA AIRWAYS CORPORATION" for the purposes of
13 *Exchange Act* Section 20(a), 15 U.S.C. §78t(a).
14

15 53. As a control person persons of "EVA AIRWAYS
16 CORPORATION" is jointly and severally liable with and to
17 the same extent as the controlled entity for its violations of
18 Section 10(b) of the *Exchange Act* and Rule 10b-5
19 thereunder.
20

21
22 **XII. FIFTH (5th) CLAIM FOR RELIEF**

23 Effecting Transactions in Security-Based Swaps with
24 Non-Eligible Contract Participants Service
25 DELAWARE and or DELAWARE LAW
26 (Violations of Section 6(I) of the Exchange Act)
27

28 54. The alleged naming defendants and or whomever
29 effected transactions in security-based swaps with or for a
30 person that is not an eligible contract participant in the
31 State DELAWARE, without such transaction transport

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1 being effected on a national securities exchange registered
2 pursuant to subsection 6(b) of the Exchange Act, 15 U.S.C.
3 §78t(b).
4

5 55. By engaging in the foregoing conduct, the alleged
6 naming defendants and or whomever have violated, and
7 unless restrained and enjoined will continue to violate,
8 Section 6(1) of the Exchange Act, 15 U.S.C. §78f(1).
9

10 **XIII. SIXTH (6th) CLAIM FOR RELIEF**

11 Restitution Delaware State Taxes & Penalties
12 Accordance Annual Report and Franchise Tax Payments
13 (Violation 18 U.S.C. §§2311-2314)
14

15 56. Consolidate FIRST (1st) CLAIM through FIFTH (5th)
16 CLAIM, that the State DELAWARE entitles all applicable
17 reinstitution annual taxes per "EVA AIRWAYS
18 CORPORATION" annual report and due franchise tax
19 payments commencing 10-24-1991 compound the amount
20 with penalty interest at 1.5% per month hereforth applied
21 until final due is paid full in the balance amount that is the
22 Secretary of State DELAWARE deemed appropriate.
23

24
25 **XIV. SEVENTH (7th) CLAIM FOR RELIEF**

26 DODD-FRANK ACT AWARD
27 12 U.S.C. §5531
28

29 57. PLAINTIFF reclaim "COMMISSIONS" attachment
30 pursuant all applicable award SARBANES-OXLEY ACT
31 defaulted of and or DODD-FRANK ACT incentive said;

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XV. PRAYER FOR RELIEF

58. Permanently restraining and enjoining the alleged naming defendants and or whomever manipulative, deceptive, or other fraudulent device or contrivance their "EVA AIRWAYS CORPORATION" as a "DELAWARE CORPORATION" perpetrate-to-extravaganza the market, buyer, investors overcounter confidence for the purpose fraudulent conveyance offering, selling and transacting to transporting securities to wit affect interstate commerce violation the above; and,

59. Ordering the alleged naming defendants and or whomever, disgorge all ill-gotten gains received directly or indirectly proceed from violation the above, pursuant to Section 21 (d)(3), 21 (d)(5) and 21(d)(7) of the *Exchange Act*, 15 U.S.C. 78u(d)(3), 78u(d)(5) and 78u(d)97).

60. Ordering the alleged naming defendants and or whomever to pay, with prejudgment interest, all ill-gotten gains by which each of them was unjustly enriched, pursuant to Exchange Act 21(d)(3), 21(d)(5), and 21 (d)(7) [15 U.S.C. 78u(d)(3), 78u(d)(5), and 78u(d)(7)]; and,

61. Ordering forfeiture capital interests in whatever corporations and partnerships the alleged naming defendants and or whomever at least ten (10) years illicit profits including but not limiting all motor vehicle, vessel, or aircraft pursuant 18 U.S.C. §§1963, 2311, 2312 proceed transact transport interest said violations;

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XVI. CONCLUSION

62. Granting such other and further relief as the court
deems just and appropriate; and,

Plaintiff reclaims all the above equitable relief which
maybe justly entitled

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Hoi sok" over "Tan", is written over a horizontal line.

Flora Hoi, and on behalf EVA, USA,

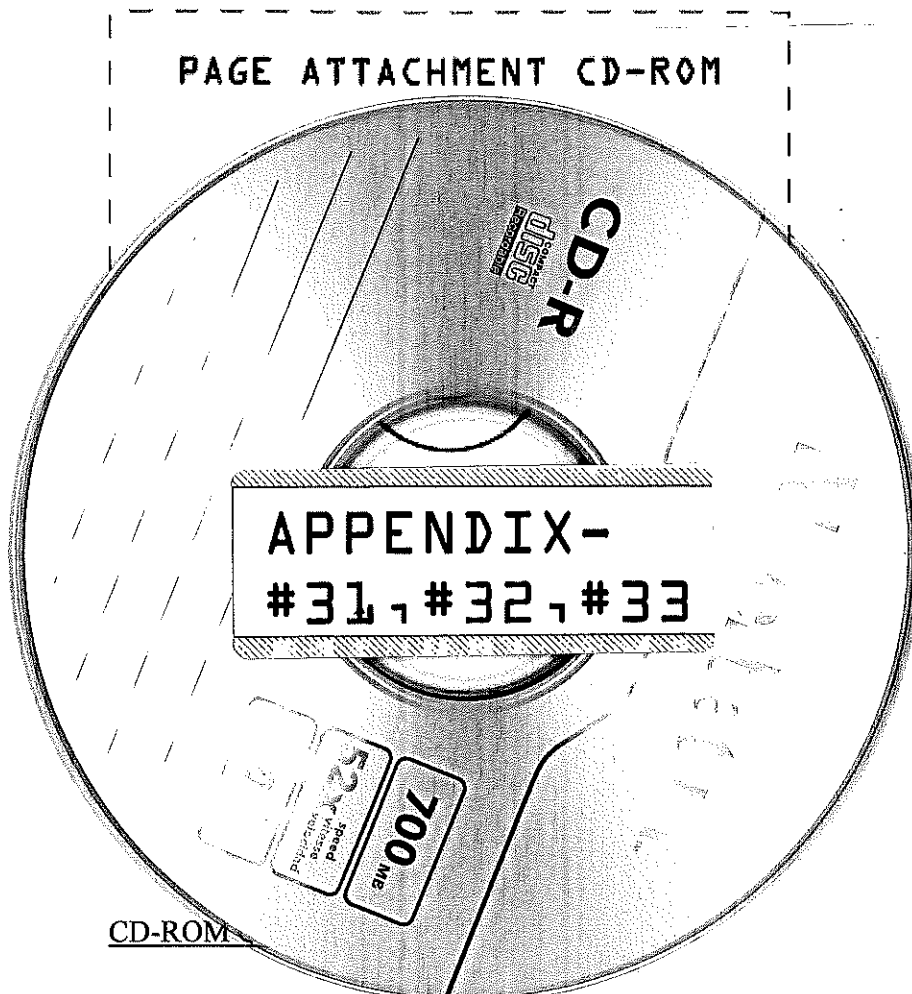
Dated 05-04-2023

Ms. Flora Hoi

3808 Creek Hollow Way

The Colony, Texas 75056-4086

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CD-ROM

1. DODD-FRANK COMPLAINT;
2. APPENDIX-31 (DKT#6);
3. APPENDIX-32 (DKT#17);
4. APPENDIX-33 (DKT#19, #20, #21);

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XVII. CERTIFICATE OF SERVICE

I, Flora Hoi, do certify on this date 05-04-2023 plaintiff entitled **DODD-FRANK COMPLAINT** with attachment been-had-being served the defendant, defendants and or defendant last known good attorneys in manner pursuant FRCP, Rule 5(C) in the process each by the USPS at:

DEFENDANT#1, DEFENDANT#5

Board of Directors
EVA AIRWAYS CORPORATION
2199 Campus Dr.
El Segundo, CA 90245

DEFENDANT#2

Ms. Donna Culver
Mr. Anthony D. Raucci
and MORRIS, NICHOLS, ARSHT & TUNNELL LLP
POBOX 1347
Wilmington, DE 19899

DEFENDANT#3

Mr. Thomas T. Liu
Ms. Andrea R. Miliano
and PHILLSBURY WINTHROP SHAW PITTMAN LLP
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5524

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DEFENDANT#4

Mr. Jacob Thomas Fain

Mr. Stafford Powell Brantley

Wick Phillips Law

100 Throckmorton Street, Suite# 1500

Forth Worth, Texas 76102

A handwritten signature in black ink, appearing to read "Hoi" over "Fain", with a horizontal line drawn through the middle of the signature.

Flora Hoi, and on behalf EVA, USA,

Dated 05-04-2023

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THIS IS END-PAGE

DODD-FRANK COMPLAINT

05-04-2023